

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	
\$900,000.00 IN UNITED STATES)	
CURRENCY,)	
)	
Defendant.)	

VERIFIED COMPLAINT IN FORFEITURE

AND NOW comes the United States of America by and through its counsel, David J. Hickton, United States Attorney for the Western District of Pennsylvania, and Lee J. Karl, Assistant United States Attorney for the Western District, and respectfully represents as follows:

1. This is a civil action in rem for the forfeiture to the United States of \$900,000.00 in United States Currency (the "Defendant Currency") pursuant to 18 U.S.C. § 981(a)(1)(C).
2. Jurisdiction is predicated upon 28 U.S.C. §1345 and §1355. Venue is proper under 28 U.S.C. §1395 and §1355.
3. The Defendant Currency constitutes proceeds of wire fraud in violation of 18 U.S.C. §1343, and, therefore, is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

4. William Kuchera and Ronald Kuchera have been the subjects of an ongoing criminal investigation (the "Investigation") conducted by the Defense Criminal Investigative Service ("DCIS") for violations of 18 U.S.C. §1343, wire fraud. The Investigation revealed that William Kuchera and Ronald Kuchera, as owners and officers of Kuchera Defense Systems ("KDS") and Kuchera Industries, Inc. ("KII") knowingly, and with intent to defraud, executed and attempted to execute a scheme to defraud the United States in contracts, subcontracts and the procurement of property, as a prime contractor and as a subcontractor where the contracts with the United States were at or over \$1,000,000.00.

5. The Investigation further revealed that, as part of the scheme, through KDS and KII, William Kuchera and Ronald Kuchera inflated billing rates to the United States by including unallowable costs certifications for overhead, general and accounting expenses. The investigation further revealed that through KDS and KII, William Kuchera and Ronald Kuchera presented an invoice to the United States for the manufacture of components which were never produced.

6. The Investigation also revealed that the Defendant Currency represents proceeds traceable to the unlawful activity.

7. By reason of the foregoing, and under the provisions of 18 U.S.C. § 981(a)(1)(C), the Defendant Currency is forfeitable to the United States.

WHEREFORE, the United States of America respectfully requests that process of warrant in rem issue for the arrest of the Defendant Currency; that judgment of forfeiture be entered in favor of the United States for the Defendant Currency; and that the United States be granted such relief as this Honorable Court may deem just and proper, together with the costs and disbursements of this Action.

Respectfully submitted,

DAVID J. HICKTON
United States Attorney

By: s/ Lee J. Karl aff
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VERIFICATION

I am a Special Agent of the Defense Criminal Investigative Service and the case agent assigned the responsibility for this case.

I have read the contents of the foregoing complaint for forfeiture and the statements contained therein are true and correct to the best of my knowledge and belief.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on this 25th day of MARCH, 2013.

Jennifer Jezewski
Jennifer Jezewski, Special Agent
DCIS